



U.S. Department of Justice

Environment and Natural Resources Division

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May 27, 1998 **DRAFT**

MEMORANDUM

To: David L. Beil
From: James A. Lofton
Re: Metropolitan Council Wastewater Treatment Plant

Provided below are suggestions for the Metropolitan Council's Compliance Schedule for the multi-hearth sludge incinerators at the Metropolitan Wastewater Treatment Plant in St. Paul:

Add to Corrective Action:

Submit a plan, due 30 days after the effective date of the Permit, for MPCA approval, which describes in detail a new design for seals on all bypass dampers. The new seal design shall be designed to eliminate air emission leakage through the dampers to the emergency stacks. This design will become an enforceable part of this Permit upon approval by the MPCA. Upon design approval by MPCA, the Metropolitan Council shall construct and install new seals as approved by MPCA.

Submit a plan, due 30 days after the effective date of the Permit, for MPCA approval, which describes in detail the steps to be implemented by the Metropolitan Council to curtail bypasses to the emergency stacks. This plan will become an enforceable part of this Permit upon approval by MPCA. The Metropolitan Council shall implement the plan as approved by the MPCA. The plan shall address, but is not limited to, elimination of emergency damper leakage, reduction of water content in sludge feed, elimination of in-leakage throughout the air pollution control train, repair or upgrading components of the air pollution control train, reduction of ID fan breakdowns, an assessment of scrubber water flow problems, determination of locations of high pressure drops in the air pollution control system, and human error as a cause of bypass events. Upon plan approval by MPCA, the Metropolitan Council shall implement the plan as approved by MPCA.

Delete Items 4 and 5:

Ceramic fiber seats have been installed on all bypass dampers.



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SENT BY: James A. Lofton

TO: Mary McAuliffe

DATE: May 27, 1998

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RE: United States v. Minnesota Metro Council

Mary: here are my draft comments to the MPCA compliance schedule.